

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JABBAR COLLINS,

DECLARATION OF
GEORGE DIAZ

Plaintiff,

-against-

THE CITY OF NEW YORK, *et al.*

11 Civ. 0766 (FB)(RML)

Defendants.

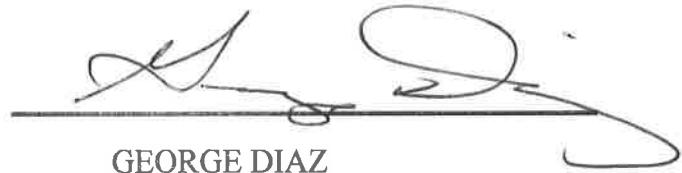
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George Diaz declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am currently employed as Administrative Manager of Technical Services at the Kings County District Attorney's Office. I have held this position since 1990.
2. In my position as Administrative Manager of Technical Services, I receive requests for multimedia support, including for Continuing Legal Education presentations made in the District Attorney's Office by members of its staff. This multimedia support includes providing video and audio recording, as well as setting up equipment for PowerPoint to accompany presentations.
3. Once a request for multimedia support is received, that request is assigned to a member of the staff and entered into my electronic calendar.
4. Attached as Exhibit 1 is a true and correct copy of my electronic calendar for the month of April 2012. The entry for April 4, 2012 reflects an appointment from 2:30 PM to 4:30 PM labeled "Pwr Pt."

5. Attached as Exhibit 2 is a true and correct copy of my electronic calendar entry for an appointment from 2:30 PM to 4:30 PM on Wednesday, April 4, 2012. The subject line contains the words "Pwr Pt," which means that the multimedia support required was a projector for PowerPoint during a presentation. The note section of this calendar entry was made according to my normal practice, in which I identify the person to whom the task is assigned by their initials, the person making the request, and any special instructions. In this case, "VH" reflects that this task was assigned to Vincent Harris, and "ADA Hersh x2149" reflects that ADA Lauren Hersh made the request, along with her contact information. Exhibit B reflects that no request was made for video capabilities.

6. I declare under penalty of perjury that the foregoing is true and correct. Executed in Brooklyn, New York, on May 8, 2014.



GEORGE DIAZ

Exhibit 1

April 2012

April 2012							May 2012						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Su	Mo	Tu	We	Th	Fr	Sa
Apr 1	2	3	4	5	6	7							
8:00am DZ off AL/CP cov (Rm. 1601) - DIAZ, GEORGE		Laptop Distribution an 8:00am 4:00pm GD off AL (Rm. 1601) - DIAZ 4:00pm 12:00am RN off AL - DIAZ, GEORGE 4:00pm 7:00pm Pwr Pt	Hosp Stmnt (KCH) - H 9:30am 3:00pm C&C - 2:30pm 4:30pm Pwr Pt 4:00pm 6:00pm CLE (B 4:00pm 4:30pm Compe 4:30pm 5:00pm Compe	9:30am CC off AL (Rm. 1601) - DIAZ, GEORGE 12:00am 8:00am AW off AL/RN cov. (Rm. 1601) - DIAZ, GEORGE 10:00am 12:00pm Interview with Rahe	Proj Safe Surrender (212 Tompkins Ave) - HARRIS, AL (Rm. 1601) - DIAZ, GEORGE								
8	9	10	11	12	13	14							
8:00am DZ off AL/CP cov (Rm. 1601) - DIAZ, GEORGE		Laptop Distribution an 9:00am 12:30pm DVD Proj Cart (Moot Ct Rm - 20 fl) - HARRIS, 4:00pm 12:00am RN off AL - DIAZ, GEORGE		12:00am 8:00am AW off AL/RN cov. (Rm. 1601) - DIAZ, GEORGE	12:00am 8:00am AW off AL/RN cov. (Rm. 1601) - DIAZ, GEORGE	Interview Robert Colle 2:00pm 5:30pm CC off AL (Rm. 1601) - DIAZ, GEORGE							
15	16	17	18	19	20	21							
8:00am DZ off AL/CP cov (Rm. 1601) - DIAZ, GEORGE		Laptop Distribution an 8:00am 4:00pm GD off AL (Rm. 1601) - DIAZ 9:30am 5:30pm CC off AL (Rm. 1601) - DIAZ 4:30pm 5:00pm Cancel		9:30am 3:00pm C&C - WILLIAMS, HAROLD R 10:00am 6:00pm HW off AL (Rm. 1610) -	9:30am 3:00pm C&C - WILLIAMS, HAROLD R 10:00am 6:00pm HW off AL (Rm. 1610) -	4:00pm 5:30pm CLE (BKTR) - HARRIS, VI							
22	23	24	25	26	27	28							
8:00am DZ off AL/CP cov (Rm. 1601) - DIAZ, GEORGE		Laptop Distribution an 8:30am 3:00pm Pwr Pt (Muster Room) - HA 4:00pm 12:00am RN off AL - DIAZ, GEORGE 5:00pm 8:30pm Play D		8:00am 3:00pm C&C - WILLIAMS, HAROLD R 8:00am 2:00pm Career 1:30pm 5:00pm Pwr Pt 2:00pm 2:30pm Possible 5:00pm 8:30pm Play D	8:00am 3:00pm C&C - WILLIAMS, HAROLD R 8:00am 2:00pm Career 1:30pm 5:00pm Pwr Pt 2:00pm 2:30pm Possible 5:00pm 8:30pm Play D	12:00am 8:00am AW off AL/RN cov. (Rm. 1601) - DIAZ, GEORGE Pt (Muster Rm 18 fl) 10:00am 6:00pm HW off AL Our Wedding							
29	30	May 1	2	3	4	5							

Exhibit 2

DIAZ, GEORGE

Subject: Pwr Pt
Location: Muster Room

Start: Wed 4/4/2012 2:30 PM
End: Wed 4/4/2012 4:30 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: HARRIS, VINCENT R
Required Attendees: CHRISTIE, CORNEL; DIAZ, GEORGE; JOHN, CURTIS; NELSON, RONALD J; PARENTE, CHARLES P.; WILLIAMS, HAROLD R; WONG, ALAN; ZEMA, DAVID A

VH

ADA Hersh x 2149